

EXHIBIT B

DC-16-03702

Jh'Mella Norman

CAUSE NO. _____

PAULINE PATRICK, § IN THE DISTRICT COURT OF
Plaintiff, §
§
V. § DALLAS COUNTY, TEXAS
§
ROBERT E. WOOD, §
INDIVIDUALLY AND COVENANT §
TRANSPORT, INC. §
Defendants. § _____ TH JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, PAULINE PATRICK, who complains of ROBERT E. WOOD, Individually, and COVENANT TRANSPORT, INC., Defendants and for her causes of action would respectfully show:

I.
DISCOVERY CONTROL PLAN

Plaintiff asserts that this suit is for monetary relief over \$1,000,000 and that discovery shall be conducted under a **Level Three (3)** discovery control plan, pursuant to Rule 190.4 of the Texas Rules of Civil Procedure pursuant to a Scheduling Order approved by this Court.

II.
PARTIES

Plaintiff, PAULINE PATRICK is an individual residing in Alicante, Spain, but at the time of the incident in question and at all times relevant to this cause of action was residing in Dallas County, Texas.

Defendant, ROBERT E. WOOD, an individual who is a nonresident of Texas and whose home is located at 398 Ripley Hill Road, City of Coventry, Tolland County, Connecticut 06238, may be served with process by serving the Chairman of the Texas Transportation Commission at

125 E. 11th Street, Austin, Texas 78701, as defendant's agent for service because defendant was a party to a collision or accident while operating a motor vehicle in Texas. Tex. Civ. Prac. & Rem. Code §§17.062(a), 17.063.

Defendant, COVENANT TRANSPORT, INC. is a Foreign For-Profit Corporation, licensed to do and do business in Texas. This defendant may be served by serving its registered agent for service, Corporation Service Company dba CSC – Lawyers Incorporating Services Company at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

**III.
VENUE**

Venue is proper in Dallas County, Texas, because all or a substantial part of the events or omissions occurred in the County. Tex. Civ. Prac. & Rem. Code § 15.002(a)(1).

**IV.
JURISDICTION**

The damages sought in the lawsuit are within the jurisdictional limits of the Court and venue is properly laid in the Court, therefore, the Court has lawful jurisdiction of the cause.

**V.
FACTS**

On April 16, 2014, Plaintiff PAULINE PATRICK was driving a Lincoln LS in the right lane traveling eastbound on IH20 in Mesquite, Texas. While driving, Plaintiff was suddenly and unexpectedly impacted in the rear of her vehicle by Defendant, ROBERT E. WOOD, who was driving a Freight Liner tractor trailer vehicle owned by Defendant, COVENANT TRANSPORT, INC. This negligence proximately caused a collision in which Plaintiff sustained personal injuries, property damage and diminution of value to her vehicle and loss of use of her vehicle.

**VI.
NEGLIGENCE**

As a direct and proximate result of the acts and/or omissions of the Defendant, ROBERT E. WOOD, Plaintiff sustained personal injuries and damages. Defendant, ROBERT E. WOOD, was negligent in that, among other things:

- (a) He failed to keep a proper lookout;
- (b) He failed to control his speed;
- (c) He failed to maintain a safe and assured distance between his vehicle and that of the Plaintiff, PAULINE PATRICK; and
- (d) He failed to timely apply his brakes.

Each or all of the foregoing acts and/or omissions of the Defendant were a direct and proximate cause of the incident made the basis of this suit and the Plaintiff's injuries and damages.

**VII.
PROXIMATE CAUSE AND DAMAGES**

As a direct and proximate result of the defendant's negligence, the Plaintiff suffered and will continue, in all likelihood to suffer damages, including but not limited to: past and, in all reasonable probability, future medical expenses; past and, in all reasonable probability, future physical pain and suffering; past and, in all reasonable probability, future mental anguish; past and, in all reasonable probability, future physical impairment; past and, in all reasonable probability, future physical disfigurement.

**VIII.
VICARIOUS LIABILITY**

At the time of the acts and/or omissions made the basis of this lawsuit, Defendant, ROBERT E. WOOD, acted within the course and scope of his employment with Defendant,

COVENANT TRANSPORT, INC. and in furtherance of Defendant COVENANT TRANSPORT, INC.'s business. Thus, under the doctrine of *respondeat superior*, Defendant, COVENANT TRANSPORT, INC., is liable for all of the acts and/or omissions of Defendant, ROBERT E. WOOD enumerated herein.

Alternatively, Defendant, COVENANT TRANSPORT, INC., was the principal and his employee, namely Defendant, ROBERT E. WOOD was subject to his control, and was therefore his agent. Thus, under the doctrine of agency, Defendant, COVENANT TRANSPORT, INC., is liable for all of the acts and/or omissions of Defendant, ROBERT E. WOOD enumerated herein.

**IX.
JURY DEMAND**

Plaintiff respectfully demands her right to trial by jury and has tendered the jury fee to the District Clerk of Dallas County, Texas.

**X.
DISCOVERY REQUESTS**

REQUEST FOR DISCLOSURE

Defendants, ROBERT E. WOOD and COVENANT TRANSPORT, INC., are hereby requested to disclose, within fifty (50) days of service of Plaintiff's Original Petition and incorporated Request, the information or material described in Rule 194.2 of the Texas Rules of Civil Procedure, to the undersigned counsel for the plaintiffs.

PRAYER

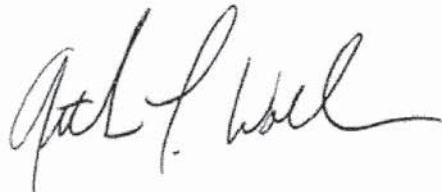
WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that Defendants be cited to appear and answer, and that on final trial Plaintiff have:

- (a) Judgment against Defendants for actual damages in an amount exceeding the minimum jurisdictional limits of the Court;

- (b) Pre-judgment interest at the highest rate allowed by law;
- (c) Costs of Court;
- (d) Post-judgment interest at the highest rate allowed by law; and,
- (e) Such other and further relief to which Plaintiff may be justly entitled, at law or in equity.

Respectfully submitted,

WALKER BRIGHT, P.C.
5407 Parkcrest Drive, Suite 300
Austin, Texas 78731
(512) 708-1600 – Telephone
(512) 708-1500 – Facsimile



By:

ARTHUR L. WALKER
State Bar No. 20693900
arthur.walker@wblpc.com

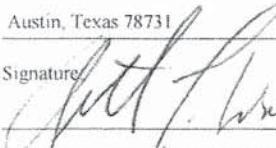
ATTORNEY FOR PLAINTIFF

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED Pauline Patrick v. Robert E. Wood and Covenant Transport, Inc.

(e.g. John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name: Arthur L. Walker	Email: arthur.walker@wblpc.com	Plaintiff(s)/Petitioner(s): Pauline Patrick	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address: 5407 Parkcrest Dr, Suite 300	Telephone: 512-708-1600	Defendant(s)/Respondent(s): Robert E. Wood, Individually and Covenant Transport, Inc.	Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____
City/State/Zip: Austin, Texas 78731	Fax: 512-708-1500	[Attach additional page as necessary to list all parties]	
Signature: 	State Bar No: 20693900		

2. Indicate case type, or identify the most important issue in the case (select only 1):

Civil				Family Law	
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)	
<i>Debt/Contract</i> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____	<input type="checkbox"/> Eminent Domain/ Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order	
<i>Foreclosure</i> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____	<input type="checkbox"/> Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<input type="checkbox"/> Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Parent-Child Relationship <input type="checkbox"/> Adoption/Acknowledgment with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
Employment	Other Civil				
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property	<input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____			
Tax	Probate & Mental Health				
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings		<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____		

3. Indicate procedure or remedy, if applicable (may select more than 1):

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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4. Indicate damages sought (do not select if it is a family law case):

<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000

WALKER BRIGHT PC

ATTORNEYS AT LAW

5407 Parkcrest Drive, Suite 300
Austin, Texas 78731
Telephone: (512) 708-1600
Facsimile: (512) 708-1500

TP

April 5, 2016

Dallas County District Clerk
600 Commerce St #103
Dallas, Texas 75202

Re: Cause No. DC-16-03702, *Pauline Patrick v. Robert E. Wood and Covenant Transport, Inc.*, In the District Court, Dallas County, Texas.

Dear Clerk:

As requested, please accept this additional \$4.00 charge to issue the citation to the Texas Transportation Commission in above-referenced matter.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

WALKER BRIGHT PC



Amanda Craven
Paralegal

amc
Enclosure

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To:
COVENANT TRANSPORT, INC.

MAY BE SERVED BY SERVING ITS REGISTERED AGENT FOR SERVICE, CORPORATION
SERVICE COMPANY DBA CSC - LAWYERS INCORPORATING SERVICES COMPANY AT
211E. 7TH STREET, SUITE 620,
AUSTIN, TEXAS 78701-3218.

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **PAULINE PATRICK**

Filed in said Court **31st day of March, 2016** against

ROBERT E. WOOD, INDIVIDUALLY AND COVENANT TRANSPORT, INC

For Suit, said suit being numbered **DC-16-03702**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 5th day of April, 2016.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By _____ **/s/ Sacheen Anthony**, Deputy
SACHEEN ANTHONY

**ESERVE
CITATION**

DC-16-03702

PAULINE PATRICK

vs.

ROBERT WOOD, et al

ISSUED THIS
5th day of April, 2016

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: SACHEEN ANTHONY, Deputy

Attorney for Plaintiff

ARTHUR LEE WALKER
arthur.walker@wblpc.com
5407 PARKCREST SUITE 300
AUSTIN TX 78731
512-708-1600

**DALLAS COUNTY
SERVICE FEES
NOT PAID**



OFFICER'S RETURN

Case No. : DC-16-03702

Court No. 14th District Court

Style: PAULINE PATRICK

vs.

ROBERT WOOD, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____. M. on the _____ day of _____
20_____, by delivering to the within named _____

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____
For mileage \$ _____
For Notary \$ _____
By _____ Deputy _____

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

To:
CITATION

ROBERT WOOD
BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND
PUBLIC TRANSPORTATION COMMISSION
125 E 11TH STREET
AUSTIN TEXAS 78701-2483

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.
Your answer should be addressed to the clerk of the **14th District Court**
at 600 Commerce Street, Dallas, Texas 75202.

Said **PLAINTIFF** being **PAULINE PATRICK**

Filed in said Court 31st day of March, 2016 against
ROBERT WOOD ET AL

For suit, said suit being numbered **DC-16-03702** the nature of which demand is as follows:

Suit On **MOTOR VEHICLE ACCIDENT** etc.

as shown on said petition , a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 5th day of April, 2016**

ATTEST: FELICIA PITRE

Clerk of the District Courts of Dallas, County, Texas

/s/ Sacheen Anthony

By _____, Deputy
SACHEEN ANTHONY

DALLAS COUNTY
SERVICE FEES
NOT PAID



No.: **DC-16-03702**
PAULINE PATRICK
VS.
ROBERT WOOD, ET AL
ISSUED
ON THIS THE 5TH DAY OF APRIL, 2016

By **SACHEEN ANTHONY**, Deputy

Attorney for : Plaintiff
ARTHUR LEE WALKER
WALKER BRIGHT PC
5407 PARKCREST SUITE 300
AUSTIN TX 78731
512) 708-1600 - Telephone

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-16-03702

Court No. 14th District Court

Style: PAULINE PATRICK
vs.
ROBERT WOOD, et al

Received this Citation the _____ day of _____, 20_____, at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20_____, at _____ o'clock, by _____
delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.
-----000000-----

**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20_____, at _____ o'clock _____. Executed at _____, 20_____, within the County of _____, State of _____, on the _____ day of _____, 20_____, at _____ o'clock _____. M. by summoning _____
the within named Corporation, _____ by delivering to _____

President - Vice President - Registered Agent - in person, of the said _____

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows:
For Serving Citation \$ _____
For Mileage \$ _____
For Notary \$ _____
Total Fees \$ _____
Sheriff _____
County of _____
State of _____
By _____

(Must be verified if served outside the State of Texas)

State of _____
County of _____

Signed and sworn to me by the said _____, 20_____, to certify which witness my hand and seal of office.
before me this _____ day of _____

Seal

State & County of _____

OFFICER'S RETURN

Case No. : DC-16-03702

Court No.14th District Court

Style: PAULINE PATRICK

vs.

ROBERT WOOD, et al

Came to hand on the 6th day of April, 2016, at 1:45 o'clock P.M. Executed at 211 E. 27th St, within the County of Tarrant at 2:30 o'clock P.M. on the 6th day of April, 2016, by delivering to the within named Corporate Service Company (See Vertrees) Covenant Transport, Inc.

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ <u>90.00</u>
For mileage	\$ _____
For Notary	\$ _____

By _____ Deputy _____

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said Rose Hessey before me this 6th day of April, 2016,

to certify which witness my hand and seal of office.

Rose Hessey
Notary Public
Dallas County TEXAS



**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

F I L E D

E S R E V E

2016 APR 11 AM 10:31

C I T A T I O N

To:

**COVENANT TRANSPORT, INC.
MAY BE SERVED BY SERVING ITS REGISTERED AGENT FOR SERVICE, CSC - LAWYERS INCORPORATING SERVICES CORPORATION AT
211E. 7TH STREET, SUITE 620,
AUSTIN, TEXAS 78701-3218.**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **PAULINE PATRICK**

Filed in said Court 31st day of March, 2016 against

ROBERT E. WOOD, INDIVIDUALLY AND COVENANT TRANSPORT, INC

For Suit, said suit being numbered **DC-16-03702**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas. Given under my hand and the Seal of said Court at office this 5th day of April, 2016.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By _____
/s/ Sacheen Anthony
SACHEEN ANTHONY, Deputy



DC-16-03702

PAULINE PATRICK

vs.

ROBERT WOOD, et al

**ISSUED THIS
5th day of April, 2016**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: SACHEEN ANTHONY, Deputy

**Attorney for Plaintiff
ARTHUR LEE WALKER
arthur.walker@wblpc.com
5407 PARKCREST SUITE 300
AUSTIN TX 78731
512-708-1600**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No.: DC-16-03702

Court No. 14th District Court

Style: PAULINE PATRICK

vs.

ROBERT WOOD, et al

Came to hand on the 6th day of April, 2016, at 1:45 o'clock P.M. Executed at 125 E 117th Street, within the County of Travis at 2:55 o'clock P.M. on the 6th day of April, 2016, by delivering to the within named (Robert Wood) Administrative Asst. To General Council by proxy Katherine Dutany, CHAIRMAN OF THE STATE HIGHWAY, each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ 90.00
For mileage \$ _____
For Notary S _____
By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said Rose Hershey before me this 6th day of April, 2016, to certify which witness my hand and seal of office.

Rose Hershey
Notary Public DALLAS County TEXAS



FORM NO. 353-4—CITATION

THE STATE OF TEXAS

FILED

ESERVE.COH

16
TELE

ROBERT WOOD

BY SERVING THE CHAIRMAN OF THE STATE HIGHWAY AND

PUBLIC TRANSPORTATION COMMISSION

123 E 11TH STREET

AUSTIN TEXAS 78701-2483

2016 APR 11 AM 10:31

CITATION

FELICIA PITRE
DISTRICT CLERK
DALLAS COUNTY TEXAS
[Signature]

No.: DC-16-03702

PAULINE PATRICK

VS.

ROBERT WOOD, ET AL

GREETINGS:
You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

a 05/03/16
Answer should be addressed to the clerk of the **14th District Court**
a 03/00 Commerce Street, Dallas, Texas 75202.

Filed in said Court 31st day of March, 2016 against

ROBERT WOOD ET AL

For suit, said suit being numbered **DC-16-03702** the nature of which demand is as follows:

Sent On **MOTOR VEHICLE ACCIDENT** etc.
as shown on said petition , a copy of which accompanies this citation. If this citation is not served, it shall be deemed unexecuted.

By SACHEEN ANTHONY, Deputy
Attorney for : Plaintiff
ARTHUR LEE WALKER
WALKER BRIGHT PC
5407 PARKCREST SUITE 300
AUSTIN TX 78731
512) 708-1600 - Telephone

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office on this the 5th day of April, 2016
ATTEST: FELICIA PITRE
Clerk of the District Courts of Dallas, County, Texas

By _____
/s/ Sacheen Anthony, Deputy

DALLAS COUNTY
SERVICE FEES
NOT PAID



CAUSE NO. DC-16-03702

PAULINE PATRICK,

PLAINTIFF,

vs.

ROBERT E WOOD, INDIVIDUALLY AND
COVENANT TRANSPORT, INC.

DEFENDANTS.

IN THE DISTRICT COURT

14TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

**DEFENDANTS ROBERT E. WOOD AND COVENANT TRANSPORT, INC.'S
ANSWER TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants Robert E. Wood and Covenant Transport, Inc. ("Defendants"), Defendants in the above-entitled and numbered Cause, and in response to Plaintiff's Original Petition on file herein, files this their Original Answer, and would respectfully show the Court as follows:

I.

GENERAL DENIAL

Subject to such stipulations and admissions as may be made hereafter, Defendants hereby enter a general denial as is permitted by Rule 92 of the Texas Rules of Civil Procedure, and request that Plaintiff be required to prove by a preponderance of the evidence the charges and allegations which she has made against Defendants.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendants Robert E. Wood and Covenant Transport, Inc. pray that, upon final hearing hereof, judgment be rendered that Plaintiff take nothing by her suit, that Defendants recover their costs in their behalf expended, and for such other relief as may be proper.

Respectfully submitted,

s/Mark S. Scudder
MARK S. SCUDDER
STATE BAR NO. 17936300
ALEX MCLEAN
STATE BAR NO. 24098082
STRASBURGER & PRICE, LLP
901 MAIN STREET, SUITE 4400
DALLAS, TX 75202-3794
(214) 651-4300
(214) 651-4330 Fax
mark.scudder@strasburger.com
alex.mclean@strasburger.com

ATTORNEYS FOR DEFENDANTS
ROBERT WOOD AND COVENANT
TRANSPORT, INC.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that on the 29th day of April, 2016, was electronically filed with the Clerk of Court in compliance with Rules 21 and 21a of the Texas Rules of Civil Procedure.

s/Mark S. Scudder
Mark S. Scudder